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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TAURIGA SCIENCES INC.

Plaintiff,

v.

COWEN, GUNTESKI & CO. P.A., et al

Defendant.

CASE NO. 3:16-CV-06285-PGS-DEA

**PLAINTIFF'S SUPPLEMENTAL
INITIAL DISCLOSURES**

PLAINTIFF'S SUPPLEMENTAL INITIAL DISCLOSURES

Plaintiff, Tauriga Sciences, Inc., by and through their undersigned counsel, hereby provides its supplemental initial disclosures, pursuant to Federal Rule of Civil Procedure 26(a)(1)(A).

Rule 26(a)(1)(A)(i)

Plaintiff presently believes the following persons have discoverable information that Plaintiff may use to support their claims or defenses in this matter:

1. Seth M. Shaw c/o Silverberg & Weiss, P.A., 1290 Weston Road, Suite 218, Weston, Florida 33326. Mr. Shaw is the CEO of Plaintiff, and has knowledge regarding the hiring of the Defendants, the background of the company including its investor relations, damages incurred as a result of the Defendant's actions and all actions utilized by Plaintiff to obtain a corrected and useful audit.

2. Ghalia Lahlou, c/o Silverberg & Weiss, P.A., 1290 Weston Road, Suite 218, Weston, Florida 33326, CFO and Corporate Secretary, and has knowledge regarding the hiring of the Defendants, the background of the company including its investor relations, damages incurred as a result of the Defendant's actions and all actions utilized by Plaintiff to obtain a corrected and useful audit.

3. Jeff Quick, c/o Silverberg & Weiss, P.A., 1290 Weston Road, Suite 218, Weston, Florida 33326, securities attorney and adviser, has knowledge of the damages and outcome of Defendant's wrongful actions as it relates to the company stock
4. Michael Pollack, KBL, LLP, 535 Fifth Ave, 30th Floor, NY, NY 10017, has knowledge of audit issues experienced by the Plaintiff and certain damages incurred as a result of Defendants' actions

Rule 26(a)(1)(A)(ii)

A copy of, or description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody or control of Plaintiff and that they may use to support their defenses unless solely for impeachment:

<u>DESCRIPTION</u>	<u>LOCATION</u>
Payments made by Tauriga for professional services rendered by CGC 2013 and 2014 Audit.	Bates Numbered: PLA000182-293.
Documents relating to services provided by Cherry Bekaert for the 2014 Audit:	Bates Numbered: PLA000294-316.
Documents relating to the engagement or retention of any anyone other than Cherry Bekaert to value Tauriga's debentures or contingent liabilities or obligations:	Bates Numbered: PLA000317-325, 374-388.
Documents relating to the arbitration between Cherry Bekaert and Tauriga:	Bates Numbered: PLA326-373; 3020-3041.
Communications with FINRA, the PCAOB or the SEC concerning Defendants:	Bates Numbered: PLA003042-3044.
Communications with FINRA, the PCAOB, the SEC and/or any other governmental, regulatory or enforcement agency regarding the de-listing from the OTCQB:	Bates Numbered: PLA000389-401; 3045-3049; 3052-3053.
Documents concerning the 8-K issued on July 29, 2015:	Bates Numbered: PLA000402-419.
Documents relating to the notification of shareholders of the PCAOB Censure:	Bates Numbered: PLA000420-458.

Documents concerning a potential reverse split of common stock:

Bates Numbered: PLA000459-462,
3056-3057.

Documents relating to the potential reverse split of common stock:

Bates Numbered: PLA000463-482.

Communications with Keith Berman:

Bates Numbered: PLA000483-524.

Documents relating to potential or proposed business relationships that were in discussions around July 2015:

Bates Numbered: PLA000525-531.

Communications relating to potential or proposed business relationships that were in discussions after July 2015:

Bates Numbered: PLA000532-557.

Documents concerning any business relationships entered into after July 2015:

Bates Numbered: PLA000558-573.

Communications relating to potential or proposed loans after July 2015:

Bates Numbered: PLA000574-1065.

Documents relating to any loan or financing obtained since July 2015:

Bates Numbered: PLA001066-1558.

Documents relating to any sale or issuance of warrants, options, promissory notes, debenture or other financial instruments since July 2015:

Bates Numbered: PLA001559-2050.

Documents relating to defaults due to the de-listing from the OTCQB and/or failure to remain in compliance with SEC regulations following the PCAOB Censure:

Bates Numbered: PLA002051-2080.

Documents concerning defaults or violations of any covenant or representation asserted prior to July 23, 2015:

Bates Numbered: PLA2081-2088.

Communications with KBL regarding the 2014 Re-audit:

Bates Numbered: PLA002089-2102.

Documents relating to actions taken to come into compliance with government reporting requirements following the issuance of the 2014 Re-audit:

Bates Numbered: PLA002103-2612.

Communications issued concerning the present litigation:

Bates Numbered: PLA002613-2654.

Documents relating to revenue received and expenses incurred under the license agreement with Green Innovations, Inc:

Bates Numbered: PLA002655-2662.

Documents relating to revenue received and expenses incurred by Tauriga under the license agreement with Synthetic Biology Pioneer Bacterial Robotics LLC:

Bates Numbered: PLA002663 and 3013-3015.

Documents relating to Pilus Energy, LLC:

Bates Numbered: PLA002664-2703.

Documents relating to the payment of the maintenance fee for U.S. Patent No. 8,354,267:

Bates Numbered: PLA002704.

Documents relating to the license agreement with Breathe Ecig Corp:

Bates Numbered: PLA002705-2716.

Documents relating to the acquisition of Honeywood, LLC:

Bates Numbered: PLA002717-2828.

Documents relating to the acquisition and August 11, 2015 divestiture of its National Wellness Business:

Bates Numbered: PLA002829-2856.

Documents relating to the obtaining of non-convertible debt financing from Alternative Strategy Partners on or about September 30, 2015:

Bates Numbered: PLA002857-2955; 3098-3099.

Documents relating to the impairment incurred to any intellectual property:

Bates Numbered: PLA002956-2969.

Communications with Eishin, Inc. relating to a potential or proposed business relationship:

Bates Numbered: PLA002970-2971; 3100.

Additional documents relating to damages:

Bates Numbered: PLA003136-3228.

Rule 26(a)(1)(A)(iii)

Plaintiff is currently calculating and evaluating its damages, which continue as of this date, and some require expert assistance. All non-privileged and discoverable documents upon which Tauriga bases its damages have been produced as detailed above and additional documents are produced herewith. Based on current available information and subject to discovery, expert opinion and continuing damages, Plaintiff discloses these expenses that do not encompass expert calculations and are mainly out of pocket expenses:

Group 10 Holdings --- Total: \$349,827.92 USD

Liquidated Damages: Period July 29, 2015 - December 6, 2016

-- \$1,000 per day Liquidated Damages (Section 7.2) \$342,000 USD

-- Application of 18% Default Rate vs. 12% Rate (Section 7.1) \$7,827.92

KBL FEES FY 2014 Re-Audit Thru FY 2017 Q2 Total: \$134,500 USD

-- \$110,000 Initial Retainer pursuant to March 2016 Engagement Agreement

-- \$14,500 Invoice for FY Q1 2017 + \$4,500 legal reimbursement

-- \$10,000 Invoice for FY Q2 2017

Cowan Guntesski Fees Paid FY 2014 and 2015 Total: \$311,565 USD

-- \$171,565 for FY 2014 (Inclusive of July 2015 \$25,000 payment)

-- \$140,000 for FY 2015

GBQ Derivative Liability Calc(s) FY 2014-2017 Q2 Total: \$21,310 USD

-- \$5,500 Paid on 10/21/2016

-- \$15,810 Balance thru FY 2016 Form 10K (Filed on October 14, 2016)

Legal Fees

--- Jeff Quick

--- Paul Silverberg

Union Capital Liquidated Damages Total: \$111,477.88

OTC MARKETS Delisting Related Bills Total: 27,500 USD

-- \$15,000 maintenance fees paid for FY 2014 and 2015 listing on OTCQB

-- \$12,500 Confirmed Fee due for Uplisting Application

Acct Work Cumulative (Separate from Auditor) Total: \$129,758.64 USD

-- Ronnie Gluck FY 2014 \$31,228.64 USD (including currency conversion)

-- Frank Lamendola FY 2014 and 2015 \$56,030 USD

-- Kevin Lacey FY 2014 (re audit), FY 2015, FY 2016 \$42,500 USD

Francois Senecal (Quebec Attorney) FY 2015 Total: approx. \$8,000

Cherry Bekaert LLP --- TOTAL: \$78,707.91

-- \$25,000 paid during Fiscal Year 2015

-- \$53,707.91 balance paid

Rule 26(a)(1)(A)(iv)

For inspection and copying any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

Not applicable.

Dated: June 1, 2017

Respectfully submitted,

By: /s/ Michael Miller

Michael Miller